

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

M.B., et al.,

Plaintiff,

v.

GOVERNOR BILL LEE, et al.

Defendant.

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No. 3:21-CV-317

DECLARATION OF JON RYSEWYK

1. I, JON RYSEWYK, pursuant to 28 U.S.C.A. § 1746, after first being duly sworn according to law, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge, information, and belief:
2. I serve as an Assistant Superintendent for the Knox County School system ("KCS"). KCS is the Local Education Agency ("LEA") for Knox County, Tennessee, and is managed and controlled by the Knox County Board of Education ("KCBOE").
3. In that role I assist in managing the Knox County School system and supervise curriculum and instruction for KCS students across all of the approximately 90 schools in the KCS system.
4. I agree with and echo the statements made in Jason Myers' declaration dated September 28, 2021.
5. KCS administration has received statements from various staff members regarding the mask mandate ordered by this Court.

6. On September 28, 2021, ten teachers and six teaching assistants or support staff were sent home due to refusal to wear a mask. All of these staff members have either resigned or are taking leave.
7. On September 29, 2021, which is the second full day of school with the mandate, nine teachers, and six teaching assistants or support staff were either sent home or stayed home due to refusal to wear a mask. These staff continue to state that they will either resign or take a leave.
8. Each teacher in KCS is responsible for a classroom of approximately 20-25 students, depending upon the school.
9. On September 28, 2021, there were a total of 722 students who did not comply with the Court's mask mandate and were grouped together. 207 of these students were enrolled in elementary schools. We know other parents kept their students at home due to the mandate, but we are unsure of how many.
10. On September 29, 2021, there were a total of 578 students who did not comply with the Court's mask mandate and were grouped together. Again, 207 of these students were enrolled in elementary schools. We know other parents kept their students at home due to the mandate, but we are unsure of how many.
11. On September 30, 2021, there were a total of 550 students who did not comply with the mandate and were grouped together. We know other parents kept their students at home due to the mandate, but we are unsure of how many.
12. On October 1, 2021, opponents of the mask mandate attempted to organize a "Freedom Day," by deliberately staying out of school. We are unsure of exactly how many students

and staff stayed home but student absences were 6,043 or a general 89.71% attendance rate for students, the first time it dipped below 90% all week. A total of 699 staff were absent.

13. KCS is suffering a loss of learning for students and a reduction in our already depleted workforce (currently 82 vacant teaching positions) due to the Court's mask mandate.

Executed on the ____ day of October, 2021.



JON RYSEWYK